

REMARKS / ARGUMENTS

Claims 1 and 28 have been amended, Claims 32, 34, 38, and 40 have been cancelled, without prejudice or disclaimer, and new Claims 41-50 have been added; therefore, Claims 1-31, 33, 35-37, 39, and 41-50 are pending. Applicant has carefully considered the application in view of the Examiner's action and, in light of the foregoing amendments and the following remarks, respectfully requests reconsideration and full allowance of all pending claims.

Claim Rejection – 35 USC § 112

Claims 32, 34, 38, and 40 stand rejected under 35 U.S.C. § 112, second paragraph, because the Specification does not properly provide support for either environmental variables or global variables with regard to URLs. In response, Applicant has cancelled Claims 32, 34, 38, and 40, without prejudice or disclaimer, rendering the rejection thereof moot, and accordingly, respectfully requests that the rejection of Claims 32, 34, 38, and 40 under 35 U.S.C. § 112, second paragraph, be withdrawn.

Claim Rejection – 35 USC § 103

Claims 1, 28, 30, 31, 36, and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,009,436 to Motoyama et al. (hereinafter "*Motoyama*") in view of U.S. Patent No. 6,901,403 to Bata et al. (hereinafter "*Bata*") and further in view of U.S. Patent No. 6,538,673 to Maslov (hereinafter "*Maslov*"). Claims 2-7 and 9-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Motoyama* in view of *Bata* and *Maslov* in further view of Microsoft FrontPage 2000, Screen Shots, 12/31/99, pp. 1-20 (hereinafter "*FrontPage*"). Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Motoyama* in view of *Bata*, *Maslov*, *FrontPage*, and in further view of U.S. Patent No. 5,574,898 to Leblang et al. (hereinafter "*Leblang*"). Claims 29, 32, 35, and 38 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Motoyama* in view of *Bata* and *Maslov*, and in further view of U.S. Patent No. 6,549,952 to Plassmann et al. (hereinafter "*Plassmann*"). Claims 33 and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Motoyama* in view of *Bata* and *Maslov*, and in further view of U.S. Patent No. 6,510,461 to Nielsen (hereinafter

“Nielsen”). In response, Applicant has amended independent Claims 1 and 28 such that they now more clearly distinguish, and are patentable over the cited references.

Specifically, and in addition to the Remarks and Arguments set forth in previous responses, independent Claims 1 and 28 have been amended to more particularly point out and distinctly claim one of the distinguishing characteristics of the present invention, namely, the step of automatically manipulating the content of markup language documents. These amendments are supported, by way of example but not limitation, by paragraphs [0140] – [0155], and therefore, add no new matter to the application as originally filed.

Motoyama has been cited as fully disclosing Applicant’s invention as recited in Claims 1 and 28, except merely for (1) the teaching that the markup language file containing tag names contains arbitrarily named tags and wherein the directory structure storing the markup language file contains folders, subfolders, and files, complying with the structure of the first markup language file, wherein each of the folders and subfolders depend from the tag names in the markup language file, for which *Bata* was cited, and (2) the teaching that the steps of downloading, parsing, and storing are automatically performed by said processor upon completion of the preceding steps, for which *Maslov* was cited. *Motoyama*, however, fails to either teach or suggest all the steps of automatically downloading, parsing, storing, and manipulating, upon completion of the preceding steps, as recited by Applicant in Claims 1 and 28, as now amended. In clear contrast to Applicant, *Motoyama* does not perform all these steps of downloading, parsing, storing, and manipulating automatically, but requires interactive input from a user for mapping a first structured information format to a second structured information format (see, e.g., the Abstract, Claim 1), including “downloading ...” (col. 16, lines 1-15, “displays file name that user selects for opening”, “allows user to approve” or “request”) and “parsing ...” (col. 11, lines 28-32, “output from the SGML Parser 202 to be utilized as input to a Map Editor 208, along with an interactive User 210 input”). That *Motoyama* requires an interactive user is in fact pervasive throughout *Motoyama*, as seen, for example, at col. 2, lines 56-57; at col. 2, lines 66-67; at col. 3, line 1 – col. 4, line 14; at col. 22, lines 64-65; at col. 24, lines 10-12; at col. 24, lines 45-53; at col. 25, lines 14-15; at col. 25, lines 34 - col. 26, line 25; at col. 25, lines 47-48; at col. 27, lines 43 – col. 29, line 3; and in Claims 1(c), 9, 10, 11, 12, 13, 14, 20(h), 22, 23, 32, 33, 34, 35, 36, 42, 43, 44, and 45.

Maslov has been cited for curing this deficiency of *Motoyama*. However, in view of the foregoing, it is clear that it is part of the intended functionality of *Motoyama* to enable a user to provide input interactively. Therefore, even if, for the sake of argument, *Maslov* did cure this “deficiency” of *Motoyama*, it would destroy the intended functionality of *Motoyama*. Accordingly, it is respectfully submitted that it would be improper to combine *Maslov* with *Motoyama*., and that *Maslov* should therefore be withdrawn as a prior art reference.

While in *Bata* “data are dynamically transformed” and “database data may be automatically formatted”, *Bata* fails to cure the identified deficiencies of *Motoyama*.

Still further, Claims 1 and 28 have been amended to also recite that the content of markup language documents is automatically manipulated. The prior art clearly fails to teach or even suggest such a feature.

In view of the foregoing, it is apparent that none of the cited references, either singularly or in any combination, teach, suggest, or render obvious the unique combination now recited in independent Claims 1 and 28. It is therefore respectfully submitted that Claim 1 clearly and precisely distinguishes over the cited combinations of references in a patentable sense, and is therefore allowable over those references and the remaining references of record. Accordingly, it is respectfully requested that the rejection of Claims 1 and 28 under 35 U.S.C. § 103(a) as being unpatentable over *Motoyama* in view of *Bata* and *Maslov* be withdrawn.

Claims 2-27, 29-31, 33, 35-37, and 39 depend from and further limit independent Claims 1 and 28, in a patentable sense, and, for this reason and the reasons set forth above, are also deemed to be in condition for allowance. It is, therefore, respectfully requested that the rejection of dependent Claims 2-27, 29-31, 33, 35-37, and 39 be withdrawn, as well.

New Claims 41-50 have been added to further recite automatically modifying, translating, and censoring the content of at least one web page, and automatically aggregating and summarizing the content of one or more web pages from one or more web sites. New Claims 41-50 are supported, by way of example but not limitation, by paragraphs [0140] – [0155], and therefore, add no new matter to the application as originally filed. Claims 41-50, furthermore, depend from and further limit independent Claims 1 and 28, in a patentable sense, and, for this reason and the reasons set forth above, are also deemed to be in condition for allowance.

Applicant hereby requests, under the provisions of 37 CFR 1.136(a), a three-month extension of time in the period for filing a reply in the above-identified application to an Office Action, having a mailing date of June 9, 2011. Payment of the small entity fees required under 37 CFR 1.17(a) is being made with the filing of this paper. Further, the addition of Claims 41-50 and deletion of Claims 32, 34, 38, and 40, results in six additional claims in excess of twenty claims, for which fees required under 37 CFR 1.16(i) are being paid with the filing of this paper. Applicant does not believe any other fees are due in connection with the filing of this paper; however, in the event that such payment is absent, insufficient, or unacceptable, or any other fees are required, the Commissioner is hereby authorized to charge any required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper, to Deposit Account No. 50-2032 of Scheef & Stone, L.L.P.

Applicant has now made an earnest attempt to place this application in condition for allowance, or in better condition for appeal. Therefore, Applicant respectfully requests, for the reasons set forth herein and for other reasons clearly apparent, full allowance of Claims 1-31, 33, 35-37, 39, and 41-50 so that the application may be passed to issue.

Should the Examiner have any questions or desire clarification of any sort, or deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

SCHEEF & STONE, L.L.P.

/Jack D. Stone, Jr./

Jack D. Stone, Jr.
Reg. No. 38,324

500 N. Akard Street, Suite 2700
Dallas, Texas 75201
Telephone: (214) 706-4207
Fax: (214) 706-4242
jack.stone@solidcounsel.com